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**From:** Davis, Kable [Davis.Kable@epa.gov]  
**Sent:** 12/4/2018 3:31:05 PM  
**To:** Maignan, Tawanda [Maignan.Tawanda@epa.gov]  
**Subject:** RE: 24- c question

No worries. I'm looking it over for typos now.

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**From:** Maignan, Tawanda  
**Sent:** Tuesday, December 04, 2018 10:31 AM  
**To:** Davis, Kable <Davis.Kable@epa.gov>  
**Subject:** RE: 24- c question

Great....please correct my errors before forwarding. I need to remember to proofread before hitting send.

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**From:** Davis, Kable  
**Sent:** Tuesday, December 04, 2018 10:28 AM  
**To:** Maignan, Tawanda <Maignan.Tawanda@epa.gov>  
**Subject:** RE: 24- c question

Tawanda – this is perfection. Thank you. I'll pass it along.

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**From:** Maignan, Tawanda  
**Sent:** Tuesday, December 04, 2018 10:26 AM  
**To:** Davis, Kable <Davis.Kable@epa.gov>  
**Subject:** RE: 24- c question

Bo –

We frequently review state registrations that add restrictions beyond the section 3 under the 24(c) provisions. Specifically, many states add indemnification language to SLNs for s-metolachlor and fomesafen products to deal with liability claims that cannot be placed the section 3. Further, NY state routinely utilizes 24(c)s to add restrictions based on their state geographical and aquatic limitations. Other instances include previous South Dakota 24(c)s that added environmental precautions and soil type restrictions for a dimethenamid-P/saflufenacil product. Without being able to offer an exact count estimate, I can offer that 24(c)s are registered by states on a regular basis to be more restrictive than the section 3 registration and the EPA has not disapproved.

I hope this helps!  
Tawanda

Tawanda Maignan  
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**From:** Davis, Kable

**Sent:** Monday, December 03, 2018 2:55 PM

**To:** Rosenblatt, Daniel <[Rosenblatt.Dan@epa.gov](mailto:Rosenblatt.Dan@epa.gov)>; Maignan, Tawanda <[Maignan.Tawanda@epa.gov](mailto:Maignan.Tawanda@epa.gov)>; Kenny, Daniel <[Kenny.Dan@epa.gov](mailto:Kenny.Dan@epa.gov)>

**Cc:** Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>; Davis, Donna <[Davis.Donna@epa.gov](mailto:Davis.Donna@epa.gov)>

**Subject:** RE: 24- c question

Thanks, Dan. We will get something back to you by the deadline.

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**From:** Rosenblatt, Daniel

**Sent:** Monday, December 03, 2018 2:42 PM

**To:** Davis, Kable <[Davis.Kable@epa.gov](mailto:Davis.Kable@epa.gov)>; Maignan, Tawanda <[Maignan.Tawanda@epa.gov](mailto:Maignan.Tawanda@epa.gov)>; Kenny, Daniel <[Kenny.Dan@epa.gov](mailto:Kenny.Dan@epa.gov)>

**Cc:** Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>; Davis, Donna <[Davis.Donna@epa.gov](mailto:Davis.Donna@epa.gov)>

**Subject:** 24- c question

Hi All – please work up an informal estimate or ‘gut check’ sense on how often in the past few years we have seen states add restrictions to a federal label via an SLN?

This is coming from Rick who was discussing this with the AA’s office in the context of SD’s recent email indicating they intend to add a cut off date this year to dicamba uses. Rick stressed it can be an informal response and that he’s not asking for us to pull each and every SLN from the past few years. If at all possible – please put a proposed response in play by late in the day tomorrow. Thanks.

Daniel J. Rosenblatt, Deputy Director,  
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